

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Derek Edward DiMedio  
Maria Theresa Moran

**Debtor(s)**

Derek Edward DiMedio  
Maria Theresa Moran

**Plaintiff(s)/Movant(s)**

vs.

Charles J. DeHart, III (Trustee)

**Defendant(s)/Respondent(s)**

**CHAPTER** 13

**CASE NO.** 1 - 16 -bk- 01731

**ADVERSARY NO.**    -   - ap-     
(if applicable)

**Nature of Proceeding:** Motion to Modify  
Confirmed Plan

**Document #:** 46, 48 & 49

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

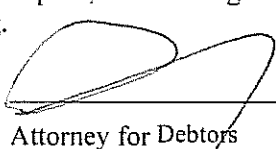
Reason for the continuance.

Documents are being exchanged and negotiations are ensuing.

Request for continuation for 30 days.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 7/24/17

  
Attorney for Debtors

Name: Gary J. Imblum

Phone Number: 717-238-5250 ext. 103

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.